

1 PATRICK J. CRONIN, WSBA #28254  
2 BENJAMIN H. RASCOFF, WSBA #45197  
3 WINSTON & CASHATT, LAWYERS  
4 601 W. Riverside, Ste. 1900  
5 Spokane, WA 99201  
6 Telephone: (509) 838-6131  
7 Facsimile: (509) 838-1416  
8 Email: [pjc@winstoncashatt.com](mailto:pjc@winstoncashatt.com)  
9 Email: [bhr@winstoncashatt.com](mailto:bhr@winstoncashatt.com)

10  
11 Attorneys for Defendants Kaiser Aluminum  
12 Washington, LLC and Kaiser Aluminum  
13 Fabricated Products, LLC  
14

15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF WASHINGTON  
17

18 MICHELLE ANDERSON, an individual,

19 Plaintiff,

20 vs.

21 KAISER ALUMINUM WASHINGTON,  
22 LLC, a foreign corporation doing business  
23 in the State of Washington; KAISER  
24 ALUMINUM FABRICATED  
PRODUCTS, LLC, a foreign corporation  
doing business in the State of Washington;  
"JOHN DOE I-V" employees, agents,  
and/or independent contractors of KAISER  
ALUMINUM WASHINGTON, LLC  
and/or KAISER ALUMINUM

No.

DECLARATION OF JOHN DONNAN  
IN SUPPORT OF NOTICE OF  
REMOVAL

25 DECLARATION OF JOHN DONNAN IN SUPPORT  
26 OF NOTICE OF REMOVAL  
27 PAGE 1

*Winston & Cashatt*  
A PROFESSIONAL SERVICE CORPORATION  
1900 Bank of America Financial Center  
601 West Riverside  
Spokane, Washington 99201  
(509) 838-6131

1 FABRICATED PRODUCTS, LLC; and  
2 "UNKNOWN BUSINESS ENTITIES I-  
3 V", jointly and severally,  
4

Defendants.

---

5 JOHN DONNAN declares as follows:

6 1. I am the Chief Administrative Officer and General Counsel for Kaiser  
7 Aluminum Corporation, which is the parent company for all Kaiser Aluminum  
8 entities.  
9

10 2. I have personal knowledge of the business structure of Kaiser  
11 Aluminum Corporation and all Kaiser Aluminum entities.  
12

13 3. Kaiser Aluminum Washington, LLC is a Delaware limited liability  
14 company with its principal place of business in California. Its sole member is Kaiser  
15 Aluminum Fabricated Products, LLC, a Delaware limited liability company with its  
16 principal place of business in California. The sole member does not reside in  
17 Washington State.  
18

19 4. The sole member of Kaiser Aluminum Fabricated Products, LLC is  
20 Kaiser Aluminum Investments Company, a Delaware corporation with its principal  
21 place of business in California. The sole member does not reside in Washington  
22 State.  
23

24 DECLARATION OF JOHN DONNAN IN SUPPORT  
OF NOTICE OF REMOVAL  
PAGE 2

*Winston & Cashatt*  
A PROFESSIONAL SERVICE CORPORATION  
1900 Bank of America Financial Center  
601 West Riverside  
Spokane, Washington 99201  
(509) 838-6131

1 I declare under penalty of perjury that the foregoing is true and correct.  
2  
3

EXECUTED this 31<sup>st</sup> day of May, 2021.

4  
5 JOHN DONNAN  
6

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

DECLARATION OF JOHN DONNAN IN SUPPORT  
OF NOTICE OF REMOVAL  
PAGE 3

*Winston & Cashatt*  
A PROFESSIONAL SERVICE CORPORATION  
1900 Bank of America Financial Center  
601 West Riverside  
Spokane, Washington 99201  
(509) 838-6131

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of June, 2021, I caused the foregoing to be served on the following parties in the manner indicated:

Matthew F. Duggan  
GLP Attorneys, P.S., Inc.  
601 W. Main Ave., Suite 305  
Spokane, WA 99201

**VIA REGULAR MAIL**   
**VIA CERTIFIED MAIL**   
**HAND DELIVERED**   
**BY FACSIMILE**   
**VIA EMAIL**

Attorney for Plaintiff

s/Patrick J. Cronin

PATRICK J. CRONIN, WSBA #28254  
BENJAMIN H. RASCOFF, WSBA #45197  
WINSTON & CASHATT, LAWYERS  
Attorneys for Defendants Kaiser Aluminum  
Washington, LLC and Kaiser Aluminum  
Fabricated Products, LLC  
601 W. Riverside, Ste. 1900  
Spokane, WA 99201  
Telephone: (509) 838-6131  
Facsimile: (509) 838-1416  
Email: [pjc@winstoncashatt.com](mailto:pjc@winstoncashatt.com)  
Email: [bhr@winstoncashatt.com](mailto:bhr@winstoncashatt.com)

DECLARATION OF JOHN DONNAN IN SUPPORT  
OF NOTICE OF REMOVAL  
PAGE 4

PAGE 4

*Winston & Cashatt*  
A PROFESSIONAL SERVICE CORPORATION  
1900 Bank of America Financial Center  
601 West Riverside  
Spokane, Washington 99201  
(509) 638-6131